

1 JEFFRY GLENN, SBN 47357
2 BERMAN, GLENN & HAIGHT
3 5 Third Street, The Hearst Building, Suite 1100
4 San Francisco, CA 94103
5 Telephone: (415) 495-3950
Fax: (415) 495-6900
e-mail: sflawyers@earthlink.net

6 Attorneys for Defendant:

7 **BAO PHUNG**

8
9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
11
12 SAN FRANCISCO DIVISION

13 **UNITED STATES OF AMERICA,**)
14 Plaintiff,) Case No. CR 11-0097 CRB
15 vs.)
16) **STIPULATION AND [PROPOSED] ORDER**
17) **TO MODIFY PRETRIAL RELEASE**
18) **CONDITIONS**
19 **BAO PHUNG,**)
20 Defendant.)

21 It is hereby Stipulated by the parties in the above-captioned matter that
22 defendant herein, Bao Phung, be allowed to modify his pretrial release
23 conditions as follows:

24 The conditions that the defendant comply with a curfew and submit to
25 electronic monitoring are deleted.

1 Based upon Bao Phung's compliances thus far, his continued employment
2 and the fact that he pled to a custodial sentence of less than three years, Mr.
3 Anthony R. Granados, the Pretrial Services Officer assigned to this matter, stated
4 that he has no objection to the conditions being modified to delete the
5 conditions that defendant comply with a curfew and submit to electronic
6 monitoring.

7
8
9 Date: September 13, 2011

10 By: _____/s/ _____
11 Jeffry Glenn (SBN. #47357)
12 BERMAN, GLENN & HAIGHT
13 Attorney for Defendant,
14 Bao Phung

15 Date: September 13, 2011

16 By: _____/s/
17 Aaron D. Wegner
18 Assistant United States Attorney
19
20
21
22
23
24
25
26
27
28

ORDER

By Stipulation of the parties,

IT IS HEREBY ORDERED that defendant Bao Phung's pretrial release conditions be modified to delete the conditions that he comply with a curfew and submit to an electronic monitoring.

Date: 09/16/2011

By: _____
The Hon. Judge Joseph C. Spero
United States Senior Judge
SOUTHERN DISTRICT OF CALIFORNIA